

Mr. Paul E. Stacey
Department of Environmental Protection
Bureau of Water Protection and Land Reuse
Planning and Standards Division
79 Elm Street
Hartford, CT 06106-5127

Testimony in support of the Proposed Stream Flow Standards and Regulations

Mr. Stacey,

As an Easton resident and member of the Nutmeg Chapter of Trout Unlimited, I am writing today to express my support for the Proposed Stream Flow Standards and Regulations. The importance of the Proposed Stream Flow Standards and Regulations, and the impact they will have of improving the quality of our state's rivers is essential.

The proposed regulations will ensure that a consistent, natural flow will exist in all of Connecticut's rivers and streams, providing the needed habitat to allow trout and other species to survive and thrive. That the proposed regulations will apply to all rivers in Connecticut is a major step in protecting the health of our rivers and streams.

I am also deeply grateful that the regulations include standards for groundwater withdrawal. The majority of us depend on groundwater for drinking and other uses, putting enormous pressure on groundwater reserves and drawing resources from those streams that support wild trout. It is important to ensure that groundwater withdrawals do not result in flow reductions in nearby streams, or even worse, the complete drying out of a streambed, which has been known to happen.

I am pleased to see that a classification process is included in the proposed regulations that would be conducted over five years, allowing public input. It is important that all voices are heard during this classification period. It is also encouraging that the proposed regulations will allow local water users to work with conservation groups, municipal officials and the state to develop individual flow management plans which may be better suited for the particular needs of their communities and the specific environmental conditions of the region.

My one concern is that there are areas where the proposed regulations should be strengthened, particularly when it comes to urban rivers which will likely be designated as Class 4 Rivers. It is my understanding that such a classification will strip virtually all of the stream flow protections from such rivers, severely limiting any chance that such streams can remain viable habitat for trout.

Just as the proposed regulations recognize that a one-size fits all approach is not the best solution and encourage individual flow management plans, they must also recognize that all urban rivers are not the same, and that even degraded rivers can be rehabilitated and restored. At the least, I encourage you to put in place minimum standards, or a sliding scale

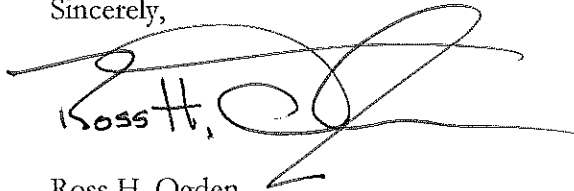
within the Class 4 designation that would ensure the river's current health and level of aquatic life is sustained while measures are taken to improve the habitat further.

As an active and involved Trout Unlimited member, I know that restoration efforts can be successful at improving rivers throughout the state. I know that there is a strong desire to protect our rivers and a will to work together, as conservationists, to work to restore them. Please allow us the opportunity to make such improvements in our urban streams. Class 4 rivers can be brought back, but we need the water flows to be there to sustain the current level of life and allow for upstream passage once we have improved the habitat.

In closing, the Proposed Stream Flow Standards and Regulations represent an important step in ensuring an abundant supply of water for human use while protecting the ecological needs and recreational enjoyment of Connecticut's rivers and streams. Balancing these needs is a difficult task, and the proposed regulations admirably create a standard that accounts for that balance.

I would ask that you carefully consider the proposed regulations in light of these and other public comments, with particular attention paid to the classification process, the need to provide at least minimal protection to Class 4 streams and the importance of including within the regulations a specific avenue for improving stream ecology.

Sincerely,

A handwritten signature in black ink, appearing to read "Ross H. Ogden", with a large, stylized flourish extending from the end of the signature.

Ross H. Ogden
9 Marsh Road
Easton, CT 06612